

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

A.Z. by and through her parents and
guardians, E.Z. and D.Z., individually, and on
behalf of the JUNO THERAPEUTICS, INC.
HEALTH BENEFIT PLAN, and on behalf of
similarly situated individuals and plans,

Plaintiff,

v.

REGENCE BLUESHIELD; and CAMBIA
HEALTH SOLUTIONS, INC.,
f/k/a THE REGENCE GROUP,

Defendants.

NO. 2:17-cv-01292-TSZ

**STIPULATION AND ORDER
RE: SCOPE OF DISCOVERY**

Counsel for the parties have met and conferred over the scope of permissible
discovery in this matter. The parties hereby stipulate and agree that discovery may be
conducted, as set forth below.

I. STIPULATION

The Plaintiff has indicated that she will be filing an Amended Complaint, as
permitted by the Court in its Order on the Defendants' Motion to Dismiss. The
Plaintiff has also indicated that the Amended Complaint will allege class-wide claims

1 and will include, among other claims, breach of fiduciary claims under ERISA. The
2 parties in this matter agree as a general proposition that discovery relating to (1) the
3 class allegations and (2) the breach of fiduciary duty claims may be permitted;
4 however, Defendants reserve all rights to object to any such discovery upon review of
5 an Amended Complaint. This stipulation is also without prejudice to either party
6 subsequently seeking any discovery-related remedy from this court.

7
8 DATED: February 22, 2018

9 KARR TUTTLE CAMPBELL

SIRIANNI YOUTZ
SPOONEMORE HAMBURGER

10
11 s/ Medora A. Marisseau

s/ Eleanor Hamburger

12 Medora A. Marisseau (WSBA #23114)

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13 Stephanie R. Lakinski (WSBA #46391)

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14 Attorneys for Defendants

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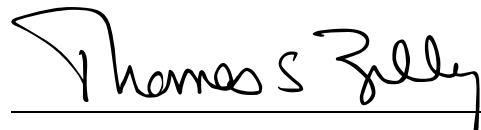
17 Attorneys for Plaintiff

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II. ORDER

Based upon the above stipulation of the parties, it is, therefore, ORDERED that, upon the filing of an Amended Complaint that contains class allegations and claims for breach of fiduciary duty, discovery relating to (1) the class allegations and (2) the breach of fiduciary duty claims is permitted in this ERISA matter. This Order is without prejudice to either party subsequently seeking any discovery-related remedy.

DATED this 2nd day of March, 2018.



Thomas S. Zilly
United States District Judge

Presented by:

SIRIANNI YOUTZ
SPOONEMORE HAMBURGER

/s/ Eleanor Hamburger
Eleanor Hamburger (WSBA # 26478)
Richard E. Spoonemore (WSBA #21833)
Attorneys for Plaintiff